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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DARRIN DICKSON

CASE NO. 1:24-cv-07573

Plaintiff,

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF**

v.

COUNTY OF HUMBOLDT, RYAN  
CAMPADONIA; and DOES 1 through 40  
inclusive,

DEMAND FOR JURY TRIAL

Defendants.

COMES NOW, Plaintiff DARRIN DICKSON, for his complaint against Defendants HUMBOLDT COUNTY, RYAN CAMPADONIA, and DOES 1-40, inclusive, alleges as follows:

**INTRODUCTION**

1. This action seeks compensatory damages, punitive damages and injunctive relief, from Defendants for violating various rights under the United States Constitution and state law in connection with the arrest of Plaintiff Darrin Dickson.

2. As alleged herein, beginning seconds after making what should have been an ordinary traffic stop, and with no good cause, Deputy Ryan Campadonia repeatedly employed excessive force on the person of Plaintiff, even though Plaintiff posed no threat to

1 Deputy Campadonia or anyone else. After affecting an unnecessary arrest, Deputy  
2 Campadonia then retaliated against Plaintiff by impounding his vehicle even though doing so  
3 was not required. The aforementioned conduct was tortious, violative of Plaintiff's rights  
4 under the Constitutions of the United States and State of California and caused injury to  
5 Plaintiff.  
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### 7 **PARTIES**

8 3. At all relevant times, Plaintiff Darrin Dickson, hereinafter DICKSON, was an  
9 individual residing in the County of Humboldt, California.

10 4. At all relevant times, the Humboldt County Sheriff's Office was a department  
11 or agency of Defendant COUNTY OF HUMBOLDT, California.

12 5. COUNTY OF HUMBOLDT is a public entity as defined by California  
13 Government Code section 811.2.

14 6. Defendant RYAN CAMPADONIA, hereinafter, CAMPADONIA, at all times  
15 herein mentioned was a public employee of COUNTY OF HUMBOLDT, to wit a deputy  
16 sheriff, as defined by California Government Code section 811.4.  
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18 7. At all times herein mentioned, Deputy CAMPADONIA was the employee of  
19 COUNTY OF HUMBOLDT.

20 8. In doing the things alleged herein, Deputy CAMPADONIA was acting within  
21 the course and scope of this employment and was acting with the consent, permission and  
22 authorization of COUNTY OF HUMBOLDT.

23 9. Plaintiffs are ignorant of the true names or capacities of the Defendants sued  
24 herein under the fictitious names Doe 1 through Doe 40, inclusive. Plaintiffs will amend this  
25 complaint to allege their true names and capacities when ascertained.  
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11. At all relevant times, DOES 1-20 were the employees or agents of COUNTY OF HUMBOLDT and at all relevant times were acting within the course and scope of their employment.

13. At all relevant times, DOES 21-40 were the employees or agents of COUNTY OF HUMBOLDT and at all relevant times were acting within the course and scope of their employment.

14. DOES 21-40 had at all relevant times the authority to create, change or modify the training, instruction, policies, departmental practices, standard operating procedures and customs of COUNTY OF HUMBOLDT Sheriff deputies and the ability to approve or ratify the conduct of COUNTY OF HUMBOLDT Sheriff deputies.

15. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1343 based on questions of federal constitutional law and 42 U.S.C. § 1983.

16. This Court has jurisdiction to issue declaratory or injunctive relief pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202 and Federal Rule of Civil Procedure 57.



1           25.       There was no delay by DICKSON in stopping. DICKSON quickly pulled  
2 over and parked his vehicle in a safe location.

3           26.       Prior to being pulled over on September 26, 2023, DICKSON was known to  
4 Deputy CAMPADONIA. Indeed, Deputy CAMPADONIA had interacted with DICKSON at  
5 least two times previously without incident.

6           27.       During prior interactions between DICKSON and Deputy CAMPADONIA,  
7 DICKSON had always been peaceful. None of CAMPADONIA's prior contacts with  
8 DICKSON culminated with any arrest.

9           28.       On information and belief, at all relevant times, at all relevant times, Deputy  
10 CAMPADONIA did not believe DICKSON had any criminal record.

11           29.       Notwithstanding his prior peaceful contacts with DICKSON, Deputy  
12 CAMPADONIA viewed DICKSON negatively and considered him "uncooperative."

13           30.       The reason why Deputy CAMPADONIA viewed DICKSON as uncooperative  
14 was because on prior contacts, DICKSON had elected not to answer questions  
15 CAMPADONIA posed to him.

16           31.       Deputy CAMPADONIA had a negative opinion of DICKSON because  
17 DICKSON had previously chosen to exercise his rights afforded to him under the United  
18 States Constitution and Constitution of the State of California not to speak with him.

19           32.       When on September 26, 2023, Deputy CAMPADONIA first approached the  
20 vehicle, DICKSON was sitting calmly in the driver seat. The vehicle was turned off, and the  
21 driver's window was rolled down a sufficient amount for DICKSON to be clearly heard by  
22 CAMPADONIA.  
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1           33.       At the time Deputy CAMPADONIA approached the vehicle, the condition of  
2 the vehicle windows was such that both DICKSON and the interior of the vehicle cabin were  
3 clearly visible to Deputy CAMPADONIA.

4           34.       At the time Deputy CAMPADONIA approached the vehicle, it was plain that  
5 nobody else was inside the vehicle other than DICKSON.

6           35.       At or around the time when Deputy CAMPADONIA approached the vehicle,  
7 a second COUNTY OF HUMBOLDT deputy sheriff, Julian Aguilera, arrived.

8           36.       At all relevant times, Deputy Aguilera was close enough such that he was able  
9 to observe the interactions between Deputy CAMPADONIA and DICKSON.

10           37.       At this time, both based on his prior interactions with DICKSON and  
11 DICKSON's behavior on that date, CAMPADONIA had no reason to believe that  
12 DICKSON was armed, violent, or posed any imminent danger to anyone.

13           38.       Despite his compliance with the stop, immediately upon approaching  
14 DICKSON's vehicle, Deputy CAMPADONIA asked DICKSON to open his door or roll  
15 down his window.

16           39.       DICKSON promptly responded to this request by stating he could hear  
17 Deputy CAMPADONIA "just fine."

18           40.       At this time, DICKSON's voice was loud enough such that Deputy  
19 CAMPADONIA could hear him.

20           41.       Deputy CAMPADONIA however then began to curse at DICKSON. The  
21 cursing began only 10 seconds after first making with DICKSON.

22           42.       Deputy CAMPADONIA yelled at DICKSON to "Open the fucking door!"  
23 DICKSON responded again that he could hear Deputy CAMPADONIA "just fine."

1           43.       There was no credible officer safety reason for DICKSON to open his door or  
2 alight from his vehicle. Nor was there any reason for Deputy CAMPADONIA to  
3 aggressively curse at DICKSON.

4           44.       At the time, DICKSON was unclear of the reason for the request and why  
5 Deputy CAMPADONIA's tone was so hostile.

6           45.       Given his hostility, DICKSON asked Deputy CAMPADONIA why he was  
7 being asked to get out of his vehicle.

8           46.       In response to this question, Deputy CAMPADONIA, for the first time,  
9 ordered DICKSON out of the vehicle—even though there was still no officer safety reason  
10 for DICKSON to exit the vehicle.

11           47.       About 10 seconds after first issuing this command, Deputy CAMPADONIA  
12 deployed his extendable baton and smashed the driver's side window of DICKSON's  
13 vehicle.

14           48.       The entire preceding contact as documented on Deputy CAMPADONIA's  
15 body worn camera was less than 30 seconds.

16           49.       Deputy CAMPADONIA's baton struck DICKSON in the forehead causing a  
17 bleeding contusion.

18           50.       Glass from the shattered window hit DICKSON's face and got in his right eye  
19 causing a corneal abrasion and other bleeding cuts on his face and scalp.

20           51.       There was no reason for Deputy CAMPADONIA to have deployed his baton  
21 at that time.

22           52.       Deputy Aguilera, who was standing nearby did not think that there was a  
23 reason for Deputy CAMPADONIA to deploy his baton.

1           53.       At the time of the baton strike, Deputy Aguilera was attempting to get the  
2 attention of Deputy CAMPADONIA to calm him down and get him to put his baton away.

3           54.       The aforementioned conduct by Deputy CAMPADONIA was violative of  
4 COUNTY OF HUMBOLDT Sherri's Department policy 303.5 in that Deputy  
5 CAMPADONIA failed to weigh the need to immediately control a suspect against the risk of  
6 causing serious injury.

7           55.       Instead of listening to Deputy Aguilera, seconds later, Deputy  
8 CAMPADONIA continued to escalate the encounter.

9           56.       Deputy CAMPADONIA yelled at DICKSON, "do you want to get fucking  
10 tased?"

11           57.       Deputy CAMPADONIA then drew his taser and pointed his taser at the chest  
12 of DICKSON.

13           58.       In response to seeing Deputy CAMPADONIA draw his taser, Deputy  
14 Aguilera used his hand to physically push the taser that Deputy CAMPADONIA was  
15 pointing at DICKSON away from DICKSON.

16           59.       Deputy Aguilera did not believe there was any reason for Deputy  
17 CAMPADONIA to have drawn his taser, point it at DICKSON and threaten to tase him.

18           60.       At this time, Deputy Aguilera believed DICKSON could be talked out of the  
19 vehicle.

20           61.       Deputy Aguilera continued to try to deescalate despite Deputy  
21 CAMPADONIA's unreasonable aggressive conduct.

22           62.       In doing the aforementioned, Deputy CAMPADONIA's use of force was  
23 excessive and contrary to what a reasonable officer would deem appropriate to employ.



1           63.       The aforementioned conduct by Deputy CAMPADONIA was additionally  
2 violative of Department policies regarding taser use including 304.5.1 and 304.5.3.

3           64.       Deputy CAMPADONIA continued to escalate the encounter despite no  
4 officer safety reason for him to do so.

5           65.       Deputy CAMPADONIA reached into the vehicle and grabbed at DICKSON.

6           66.       Deputy CAMPADONIA grabbed DICKSON momentarily by the throat,  
7 contrary to Department policy 300.3.7.

8           67.       DICKSON yelled at Deputy CAMPADONIA to get his hands off of his neck.

9           68.       While DICKSON attempted to get Deputy CAMPADONIA's hands off of  
10 him, Deputy CAMPADONIA struck DICKSON in the face with his elbow.

11           69.       At no time during the entire encounter did DICKSON ever attempt to strike or  
12 injure anyone. Instead, DICKSON used the minimal amount of force necessary to prevent  
13 further injury to his person.

14           70.       At or around this general time, multiple officers from the California Highway  
15 Patrol arrived. These officers attempted to calmly speak to DICKSON, but Deputy  
16 CAMPADONIA continued to yell and curse at DICKSON thwarting their efforts to  
17 deescalate the conflict that Deputy CAMPADONIA had created.

18           71.       DICKSON told these officers that he feared for his life.

19           72.       After being assured by officers from the California Highway Patrol that he  
20 would not be harmed, DICKSON voluntarily exited his vehicle and was placed under arrest  
21 by Deputy CAMPADONIA without incident pursuant to California Penal Code section  
22 148(a)(1).

23           73.       DICKSON was later charged by the COUNTY OF HUMBOLDT District  
24 Attorney with violating California Penal Code section 69.

1           74.       On or about May 13, 2024, all charges related to any unlawful resisting,  
2 obstructing or delaying a peace officer, or resisting an executive officer against DICKSON  
3 were dismissed on motion of the District Attorney.

4           75.       After DICKSON was arrested but still on scene, CAMPADONIA asked  
5 DICKSON what DICKSON wanted done with his vehicle.

6           76.       DICKSON asked Deputy CAMPADONIA if he could leave his vehicle where  
7 it was parked.

8           77.       Deputy CAMPADONIA remarked that the vehicle was legally parked told  
9 DICKSON that he could.

10           78.       However, in retaliation for what Deputy CAMPADONIA perceived as his  
11 earlier noncompliance, Deputy CAMPADONIA intentionally acted contrary to DICKSON's  
12 wishes and had DICKSON's vehicle towed and impounded in contravention to Department  
13 policy 502.2.3.

14           79.       Deputy CAMPADONIA knew or had reason to know that DICKSON lived in  
15 his vehicle and knew or had reason to know that by towing and impounding the vehicle, he  
16 was taking away his only shelter.

17           80.       This conduct by Deputy CAMPADONIA was punitive and intended to punish  
18 DICKSON for exercising his rights.

19           81.       Indeed, the escalation of the encounter was because Deputy CAMPADONIA  
20 resented DICKSON based on what Deputy CAMPADONIA perceived as prior  
21 "uncooperative" conduct when in fact, DICKSON was always peaceful and merely asserted  
22 his constitutional rights.

23           82.       Furthermore, Deputy CAMPADONIA admitted that he had no articulable  
24 concern about DICKSON being armed, nor belief that he was a danger. His only claim was  
25

1 that he knew DICKSON was transient and people who are transient are sometimes armed  
2 with knives.

3 83. On information and belief, the aforementioned conduct by Deputy  
4 CAMPADONIA was reviewed as part of a use of force investigation conducted by the  
5 COUNTY OF HUMBOLDT Sheriff's Department members sergeant Brian Taylor and  
6 lieutenant Brian Quenell at the direction of Sheriff William Honsal.

7  
8 84. The investigation by the COUNTY OF HUMBOLDT Sheriff's Department  
9 concluded that Deputy CAMPADONIA's conduct was "in policy."

10 **FIRST CLAIM FOR RELIEF**

11 **Unreasonable Search and Seizure—Excessive Force (42 U.S.C. § 1983)**  
12 **(By Plaintiff against Defendant CAMPADONIA and Does 1-20)**

13 85. Plaintiffs repeat and reallege each and every allegation in the preceding  
14 paragraphs as if stated fully herein.

15 86. Defendant CAMPADONIA breaking the window of DICKSON's vehicle  
16 with his baton and striking DICKSON deprived DICKSON of his right to be secure in his  
17 persons against unreasonable searches and seizures as guaranteed to DICKSON under the  
18 Fourth Amendment to the United States Constitution and applied to state actors by the  
19 Fourteenth Amendment.

20 87. This unreasonable use of force by Defendants CAMPADONIA deprived  
21 DICKSON of his right to be secure in his person against unreasonable searches and seizures  
22 as guaranteed to DICKSON under the Fourth Amendment to the United States Constitution  
23 and applied to state actors by the Fourteenth Amendment.

24 88. As a result, DICKSON experienced mental and physical pain and suffering.  
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89. The conduct of CAMPADONIA was willful, wanton, malicious, and done with reckless disregard for the rights and safety of DICKSON and therefore warrants the imposition of exemplary and punitive damages as to Defendant CAMPADONIA

90. Plaintiffs also seek attorney fees under this claim.

### **SECOND CLAIM FOR RELIEF**

#### **Unreasonable Search and Seizure—Excessive Force (42 U.S.C. § 1983) (By Plaintiff against Defendant CAMPADONIA and Does 1-20)**

91. Plaintiffs repeat and reallege each and every allegation in the preceding paragraphs as if stated fully herein.

92. Defendant CAMPADONIA brandishing his taser at DICKSON and threatening to taze him deprived DICKSON of his right to be secure in his persons against unreasonable searches and seizures as guaranteed to DICKSON under the Fourth Amendment to the United States Constitution and applied to state actors by the Fourteenth Amendment.

93. This unreasonable use of force by Defendants CAMPADONIA deprived DICKSON of his right to be secure in his person against unreasonable searches and seizures as guaranteed to DICKSON under the Fourth Amendment to the United States Constitution and applied to state actors by the Fourteenth Amendment.

94. As a result, DICKSON experienced mental and physical pain and suffering.

95. The conduct of CAMPADONIA was willful, wanton, malicious, and done with reckless disregard for the rights and safety of DICKSON and therefore warrants the imposition of exemplary and punitive damages as to Defendant CAMPADONIA

96. Plaintiffs also seek attorney fees under this claim.

### **THIRD CLAIM FOR RELIEF**

#### **Unreasonable Search and Seizure—Excessive Force (42 U.S.C. § 1983) (By Plaintiff against Defendant CAMPADONIA and Does 1-20)**

1           97.       Plaintiffs repeat and reallege each and every allegation in the preceding  
2 paragraphs as if stated fully herein.

3           98.       Defendant CAMPADONIA grabbing DICKSON by his throat and striking  
4 him with his elbow deprived DICKSON of his right to be secure in his persons against  
5 unreasonable searches and seizures as guaranteed to DICKSON under the Fourth  
6 Amendment to the United States Constitution and applied to state actors by the Fourteenth  
7 Amendment.

8           99.       This unreasonable use of force by Defendants CAMPADONIA deprived  
9 DICKSON of his right to be secure in his person against unreasonable searches and seizures  
10 as guaranteed to DICKSON under the Fourth Amendment to the United States Constitution  
11 and applied to state actors by the Fourteenth Amendment.

12           100.      As a result, DICKSON experienced mental and physical pain and suffering.

13           101.      The conduct of CAMPADONIA was willful, wanton, malicious, and done  
14 with reckless disregard for the rights and safety of DICKSON and therefore warrants the  
15 imposition of exemplary and punitive damages as to Defendant CAMPADONIA  
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17           102.      Plaintiff also seeks attorney fees under this claim.  
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19                           **FOURTH CLAIM FOR RELIEF**  
20                           **Substantive Due Process (42 U.S.C. § 1983)**  
21                           **(By Plaintiff against Defendant CAMPADONIA and Does 1-20)**

22           103.      Plaintiff repeats and realleges each and every allegation in the preceding  
23 paragraphs as if stated fully herein.

24           104.      DICKSON had a cognizable interest under the Due Process Clause of the  
25 Fourteenth Amendment of the United States Constitution to be free from state actions that  
26 deprive him of life, liberty, or property in such a manner as to shock the conscience,  
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1 including but not limited to, unwarranted state interference in seizing DICKSON'S  
2 residence, i.e., his vehicle.

3 105. As a direct and proximate cause of the acts of Defendant CAMPADONIA and  
4 DOES 1-20, DICKSON suffered mental anguish.

5 106. Defendant CAMPADONIA and DOES 1-20 are liable for DICKSON'S  
6 injuries because Defendant CAMPADONIA and DOES 1-20 were integral participants in the  
7 denial of due process.

8 107. The conduct of Defendant CAMPADONIA and DOES 1-20 was willful,  
9 wanton, malicious, and done with reckless disregard for the rights and safety of DICKSON  
10 and therefore warrants the imposition of exemplary and punitive damages as to Defendants  
11 Defendant CAMPADONIA and DOES 1-20.

12 108. Plaintiff also seeks attorney fees under this claim.

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14 **FIFTH CLAIM FOR RELIEF**

15 **Municipal Liability for Unconstitutional Custom or Policy (42 U.S.C. § 1983)**  
16 **(By Plaintiff against Defendants COUNTY OF HUMBOLDT and DOES 21-40)**

17 109. Plaintiffs repeat and reallege each and every allegation in the preceding  
18 paragraphs as if stated fully herein.

19 110. Defendants COUNTY OF HUMBOLDT and DOES 21-40 deprived  
20 DICKSON of the rights and liberties secured to him by the Fourth and Fourteenth  
21 Amendments to the United States Constitution, in that said Defendants and their supervising  
22 and managerial employees, agents, and representatives acting with reckless and deliberate  
23 indifference to the rights and liberties of the public in general, and of DICKSON specifically,  
24 knowingly maintained, enforced and applied an official recognized custom, policy, and  
25 practice of:  
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- a. Permitting excessive use of force by deputies;
- b. Employing and retaining CAMPADONIA whom COUNTY OF HUMBOLDT and DOES 21-40, at all times material herein knew or reasonably should have known had dangerous propensities for abusing his authority and for mistreating citizens by failing to follow written Department policies including, but not limited to 303.5, 304.5.1, 304.5.3, 300.3.7 and 502.2.3;
- c. Inadequately supervising, training, controlling, assigning, and disciplining CAMPADONIA whom COUNTY OF HUMBOLDT and DOES 21-40 knew or in the exercise of reasonable care should have known had the aforementioned propensities and character traits;
- d. Failing to adequately train officers, including CAMPADONIA, and failing to institute appropriate policies, regarding the use of excessive force;
- e. Having and maintaining an unconstitutional policy, custom, and practice of using excessive force, which also is demonstrated by inadequate training
- f. Ratifying the conduct of CAMPADONIA as part of the use of force investigation;

111. By reason of the aforementioned policies and practices of COUNTY OF HUMBOLDT and DOES 21-40, DICKSON was injured.

112. Defendants COUNTY OF HUMBOLDT and DOES 21-40, together with various other officials, whether named or unnamed, had either actual or constructive knowledge of the deficient policies, practices and customs alleged in the paragraphs above. Despite having knowledge as stated above these defendants condoned, tolerated and through actions and inactions thereby ratified such policies. Said defendants also acted with

1 deliberate indifference to the foreseeable effects and consequences of these policies with  
2 respect to the constitutional rights of DICKSON.

3 113. By perpetrating, sanctioning, tolerating and ratifying the outrageous conduct  
4 and other wrongful acts, Defendants COUNTY OF HUMBOLDT and DOES 21-40, acted  
5 with an intentional, reckless, and callous disregard for the welfare of DICKSON.

6 114. Defendants COUNTY OF HUMBOLDT and DOES 21-40, each of their  
7 actions were willful, wanton, oppressive, malicious, fraudulent, and extremely offensive and  
8 unconscionable to any person of normal sensibilities.

9 115. Furthermore, the policies, practices, and customs implemented and maintained  
10 and still tolerated by Defendants COUNTY OF HUMBOLDT and DOES 21-40, were  
11 affirmatively linked to and were a significantly influential force behind the injuries of  
12 DICKSON.

13 116. Plaintiff also seeks attorney fees under this claim.

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16 **SIXTH CLAIM FOR RELIEF**  
17 **Municipal Liability – Failure to Train (42 U.S.C. § 1983)**  
18 **(By Plaintiff against Defendants COUNTY OF HUMBOLDT and DOES 21-40)**

19 117. Plaintiff repeats and realleges each and every allegation in the preceding  
20 paragraphs as if stated fully herein.

21 118. While acting under the color of state law and within the course and scope of  
22 their employment, Defendant CAMPADONIA deprived DICKSON of his rights and liberties  
23 secured to him by the Fourth and Fourteenth Amendments, including his right to be free from  
24 unreasonable search and seizure.

25 119. The training policies of the Defendants COUNTY OF HUMBOLDT and  
26 DOES 21-40 were not adequate to train its deputies, including but not limited to,  
27



1 CAMPADONIA, with regards to using force and use of de-escalation tactics. As a result,  
2 CAMPADONIA was not able to handle the usual and recurring situations with which he  
3 must deal, including making contact with unarmed individuals during an ordinary traffic  
4 stop.

5 120. These inadequate training policies existed prior to the date of this incident and  
6 continue to this day.

7 121. Defendants COUNTY OF HUMBOLDT and DOES 21-40 were deliberately  
8 indifferent to the known or obvious consequences of their failure to train deputies, including  
9 CAMPADONIA, adequately with regards to using force and employment of de-escalation  
10 tactics.

11 122. The failure of Defendants COUNTY OF HUMBOLDT and DOES 21-40 to  
12 provide adequate training caused the deprivation of DICKSON'S rights by CAMPADONIA.  
13 In other words, the Defendant's failure to train is so closely related to the deprivation of the  
14 DICKSON'S rights as to be the moving force that caused the ultimate injury.

15 123. By failing to provide adequate training to CAMPADONIA, Defendants  
16 COUNTY OF HUMBOLDT and DOES 21-40 acted with an intentional, reckless, and  
17 callous disregard for the welfare of DICKSON and DICKSON'S constitutional rights.

18 124. Defendants COUNTY OF HUMBOLDT and DOES 21-40, each of their  
19 actions were willful, wanton, oppressive, malicious, fraudulent, and extremely offensive and  
20 unconscionable to any person of normal sensibilities.

21 125. By reason of the aforementioned acts and omissions of Defendants COUNTY  
22 OF HUMBOLDT and DOES 21-40, DICKSON sustained injury.

23 126. Plaintiff also seeks attorney fees under this claim.

24 **SEVENTH CLAIM FOR RELIEF**

**Battery (Cal. Govt. Code § 820 and California Common Law)**  
**(By Plaintiff against all Defendants)**

127. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if stated fully herein.

128. Defendant CAMPADONIA, while working as a deputy for Defendant COUNTY OF HUMBOLDT, engaged in unwanted contact with DICKSON'S PERSON and caused injury to DICKSON by a baton strike, by grabbing DICKSON'S neck and by striking DICKSON with his elbow.

129. DICKSON did not consent to the contact.

130. The use of force was unreasonable.

131. As a result of the actions of Defendant CAMPADONIA, DICKSON sustained injury.

132. The conduct of Defendant CAMPADONIA was a substantial factor in causing harm to DICKSON.

133. Defendants COUNTY OF HUMBOLDT and DOES 21-40 are vicariously for the wrongful acts of Defendant CAMPADONIA pursuant to section 815.2(a) of the California Government Code, which provides that a public entity is liable for the injuries caused by its employees within the scope of the employment if the employee's act would subject him or her to liability.

134. The conduct of Defendant CAMPADONIA was malicious, wanton, oppressive, and accomplished with a conscious disregard for the rights of DICKSON entitling DICKSON to an award of exemplary and punitive damages.

**EIGHTH CLAIM FOR RELIEF**  
**Assault (Cal. Govt. Code § 820 and California Common Law)**  
**(By Plaintiff against all Defendants)**

135. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if stated fully herein.

136. Defendant CAMPADONIA, while working as a deputy for Defendant COUNTY OF HUMBOLDT, pointed his taser at DICKSON, cursed at him, and threatened to taze him.

137. The threat of force was unreasonable, and caused DICKSON to reasonably apprehend that he was about to be touched in a harmful or offensive manner.

138. DICKSON did not consent to the conduct of Defendant CAMPADONIA.

139. The actions of Defendant CAMPADONIA put DICKSON in reasonable apprehension that the harmful or offensive contact was in fact going to occur.

140. As a result of the actions of Defendant CAMPADONIA, DICKSON sustained injury.

141. The conduct of Defendant CAMPADONIA was a substantial factor in causing harm to DICKSON.

142. Defendants COUNTY OF HUMBOLDT and DOES 21-40 are vicariously for the wrongful acts of Defendant CAMPADONIA pursuant to section 815.2(a) of the California Government Code, which provides that a public entity is liable for the injuries caused by its employees within the scope of the employment if the employee's act would subject him or her to liability.

143. The conduct of Defendant CAMPADONIA was malicious, wanton, oppressive, and accomplished with a conscious disregard for the rights of DICKSON entitling DICKSON to an award of exemplary and punitive damages.

**NINTH CLAIM FOR RELIEF**

**Negligence (Cal. Govt. Code § 820 and California Common Law)  
(By Plaintiff against all Defendants)**

144. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if stated fully herein.

145. The actions and inactions of the Defendants were negligent, including, but not limited to:

- a. the failure by Defendants COUNTY OF HUMBOLDT and DOES 21-40 to properly and adequately train employees, including Defendant CAMPADONIA and DOES 1-20, with regards to the use of force and de-escalation tactics;
- b. the failure of Defendant CAMPADONIA and DOES 1-20 to properly and adequately assess the need to detain, arrest, and use force, against DICKSON;
- c. the negligent tactics and handling of the situation with DICKSON by Defendant CAMPADONIA and DOES 1-20,
- d. the negligent arrest, and use of force against DICKSON by Defendant CAMPADONIA and DOES 1-20;
- e. the seizing and impoundment of DICKSON'S vehicle by Defendant CAMPADONIA and DOES 1-20.

146. As a direct and proximate result of defendants' conduct as alleged above, and other undiscovered negligent conduct, DICKSON suffered injury.

147. Defendants COUNTY OF HUMBOLDT and DOES 21-40 are vicariously liable for the wrongful acts of Defendant CAMPADONIA and DOES 1-20 pursuant to section 815.2(a) of the California Government Code, which provides that a public entity is

liable for the injuries caused by its employees within the scope of the employment if the employee's act would subject him or her to liability.

148. The conduct of Defendant CAMPADONIA and DOES 1-20 was malicious, wanton, oppressive, and accomplished with a conscious disregard for the rights of DICKSON entitling DICKSON to an award of exemplary and punitive damages.

**TENTH CLAIM FOR RELIEF**  
**Violation of Bane Act (Cal. Civil Code § 52.1)**  
**(By Plaintiff against all Defendants)**

149. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if stated fully herein.

150. California Civil Code, Section 52.1 (the Bane Act), prohibits any person from interfering with another person's exercise or enjoyment of his constitutional rights by threats, intimidation, or coercion (or by the use of unconstitutionally excessive force).

151. The essence of a Bane Act claim is that the defendant, by the specified improper means (i.e., threats, intimidation or coercion), tried to or did prevent the plaintiff from doing something he or she had the right to do under the law or to force the plaintiff to do something that he or she was not required to do under the law.

152. Conduct that violates the Fourth Amendment violates the California Bane Act.

153. In doing the acts alleged herein, Defendant CAMPADONIA and DOES 1-20 deprived DICKSON of his right to be free from unreasonable searches and seizures under the Fourth Amendment and applied to state actors by the Fourteenth Amendment.

154. As alleged herein, Defendant CAMPADONIA and DOES 1-20 unlawfully used excessive force, arrested, and impounded DICKSON'S vehicle in order to interfere with, and as retaliation for, DICKSON exercising his constitutional rights under the First and Fifth Amendments to the Constitution of the United States.

1           155.       The conduct by Defendant CAMPADONIA described herein related to  
2 compelling DICKSON to open his door and alight from his vehicle, which he did not want to  
3 do, was unreasonable. While law enforcement officers may order a person to alight from  
4 their vehicle, the lawfulness of the command is contingent on a reasonable officer safety  
5 reason for doing so.

6           156.       Furthermore, Defendant CAMPADONIA and DOES 1-20, retaliated against  
7 DICKSON by doing the acts herein alleged because DICKSON questioned why it was  
8 necessary for him to roll down his window or open the door to his vehicle.

9           157.       Immediate, instantaneous compliance is not required by law. Verbal  
10 challenges to police action are protected by the First Amendment.

11           158.       Speech is generally protected by the First Amendment, even if it intended to  
12 interfere with the performance of an officer's duty.

13           159.       California law makes clear that the fact that someone verbally challenges a  
14 police officer's authority, or is slow to comply with orders, does not mean that he or she has  
15 delayed an investigation. If asking a question causes a delay, that delay is a lawful delay.

16           160.       Here, Defendant CAMPADONIA and DOES 1-20 intentionally used  
17 excessive force, arrested, detained, and impounded DICKSON'S vehicle both to compel  
18 DICKSON into alighting from his vehicle and in retaliation for DICKSON exercising his  
19 rights under the First and Fifth Amendments to the Constitution of the United States, both on  
20 September 26, 2023, and previously.

21           161.       Resulting from the conduct of Defendant CAMPADONIA and DOES 1-20,  
22 DICKSON was harmed.

23           162.       The conduct of Defendant CAMPADONIA and DOES 1-20 was a substantial  
24 factor in causing harm to DICKSON.

163. Defendants COUNTY OF HUMBOLDT and DOES 21-40 are vicariously for the wrongful acts of Defendant CAMPADONIA and DOES 1-20 pursuant to section 815.2(a) of the California Government Code, which provides that a public entity is liable for the injuries caused by its employees within the scope of the employment if the employee's act would subject him or her to liability.

**REQUEST FOR RELIEF**

165. A preliminary and permanent injunction requiring Defendants to undergo training on de-escalation tactics and excessive force;

167. Punitive damages for Plaintiff according to proof;

169. Costs of suit;

171. Such other and further relief as the Court may deem just and proper.

**LAW OFFICE OF  
BENJAMIN MAINZER, A.P.C.**

Plaintiff demands a trial by jury on all claims.

**LAW OFFICE OF  
BENJAMIN MAINZER, A.P.C.**

By: /S/  
BENJAMIN H. MAINZER  
Attorneys for Plaintiff